

EXHIBIT "C"

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CANDACE RAY

Plaintiff

V.

ABINGTON TOWNSHIP,
CHIEF OF POLICE WILLIAM KELLY,
POLICE OFFICER NISBET, S.,
POLICE OFFICER J. KING,
POLICE OFFICER BRUCE HASLAM,
POLICE OFFICER MATZ,
POLICE OFFICER RAWTZ,
POLICE OFFICER SCHOLL,
POLICE OFFICER MANN,
ABINGTON MEMORIAL HOSPITAL, and
MARK SCHNEE

Defendants

CIVIL ACTION

02-CV-04382

**EXHIBIT LIST OF DEFENDANTS,
ABINGTON MEMORIAL HOSPITAL AND MARK SCHNEE**

| No. | Exhibit | Identified | | Admitted |
|------|---|------------|----|----------|
| | | Date | By | |
| D-1 | Medical records of Candace Ray from AMH relative to ER Admission of 07/02/00 | | | |
| D-2 | Medical records of Candace Ray from AMH relative to ER Admission of 05/11/99 | | | |
| D-3 | Medical records of Candace Ray from AMH relative to ER Admission of 11/03/00 | | | |
| D-4 | Medical records of Candace Ray from Abington-Creekwood Treatment Center | | | |
| D-5 | AMH TDS Encounter History relative to Candace Ray | | | |
| D-6 | Medical records of Candace Ray from Second Alarmers Rescue Squad regarding EMS transport on 07/02/00 | | | |
| D-7 | Medical records of Candace Ray from Montgomery County Emergency Services relative to Admission of 07/03/00 (as produced by Plaintiff) | | | |
| D-8 | Medical records of Candace Ray from Central Montgomery Health/Mental Retardation Center (as produced by Plaintiff) | | | |
| D-9 | Medical records of Candace Ray from Milestones Partial Hospital (as produced by Plaintiff) | | | |
| D-10 | Medical records of Candace Ray from Progressions of Fort Washington (as produced by Plaintiff) | | | |

| No. | Exhibit | Identified | | Admitted |
|------|--|------------|----|----------|
| | | Date | By | |
| D-11 | Medical records of Candace Ray from Abington/Lawndale (as produced by Plaintiff) | | | |
| D-12 | Medical records of Candace Ray from Grandview Hospital relative to Admission of 04/01/96 (psych admission) | | | |
| D-13 | Medical records of Candace Ray from Hal Hockfield, M.D. (primary care) | | | |
| D-14 | Medical records of Candace Ray from Northwestern Institute (no record statement) | | | |
| D-15 | Medical records of Candace Ray from Norristown State Hospital (no record statement) | | | |
| D-16 | Medical records of Candace Ray from Laurance Smith, M.D. (no record statement) | | | |
| D-17 | Records of Candace Ray from the Pennsylvania Bureau of Consumer Protection (no record statement) | | | |
| D-18 | Any and all x-rays and diagnostic films | | | |
| D-19 | Any and all medical billing statements | | | |
| D-20 | Deposition transcript of Candace Ray dated 02/21/03 and exhibits identified therein. | | | |
| D-21 | Deposition transcript of Candace Ray dated 05/21/03 and exhibits identified therein | | | |

| No. | Exhibit | Identified | | Admitted |
|------|--|------------|----|----------|
| | | Date | By | |
| D-22 | Deposition transcript of Mark Schnee dated 09/17/03 and exhibits identified therein | | | |
| D-23 | Deposition transcript of Officer Jeanette King dated 09/05/03 and exhibits identified therein | | | |
| D-24 | Deposition transcript of Officer Shaun Nisbet dated 09/05/03 and exhibits identified therein | | | |
| D-25 | Deposition transcript of Officer Robert Mann dated 09/05/03 and exhibits identified therein | | | |
| D-26 | Deposition transcript of John R. Grob dated 04/21/03 and exhibits identified therein | | | |
| D-27 | Deposition transcript of Christopher W. Stewart dated 09/11/03 and exhibits identified therein | | | |
| D-28 | Curriculum Vitae of Timothy Michals, M.D. | | | |
| D-29 | Expert report of Timothy Michals, M.D. dated 10/09/03 | | | |
| D-30 | Expert report of Timothy Michals, M.D. dated 11/12/03 | | | |
| D-31 | General Medical Interpretative Report (MNPI-2) relevant to Candace Ray dated 09/24/03 | | | |
| D-32 | Any and all pleadings | | | |

| No. | Exhibit | Identified | | Admitted |
|------|--|------------|----|----------|
| | | Date | By | |
| D-33 | Any and all Answers to Interrogatories and Expert Interrogatories by Plaintiff | | | |
| D-34 | Any and all Responses to Request for Production of Documents by Plaintiff | | | |
| D-35 | Any and all Responses to Requests for Admissions by Plaintiff | | | |
| D-36 | Any and all Answers to Interrogatories and Expert Interrogatories by Abington Township and the Police Defendants | | | |
| D-37 | Any and all Responses to Request for Production of Documents by Abington Township and the Police Defendants | | | |
| D-38 | Any and all Responses to Requests for Admissions by Abington Township and the Police Defendants | | | |
| D-39 | Any and all Answers to Interrogatories and Expert Interrogatories by Abington Memorial Hospital | | | |
| D-40 | Any and all Responses to Request for Production of Documents by Abington Memorial Hospital | | | |
| D-41 | Any and all Responses to Requests for Admissions by Abington Memorial Hospital | | | |

| No. | Exhibit | Identified | | Admitted |
|------|---|------------|----|----------|
| | | Date | By | |
| D-42 | Any and all Answers to Interrogatories and Expert Interrogatories by Mark Schnee | | | |
| D-43 | Any and all Responses to Request for Production of Documents by Mark Schnee | | | |
| D-44 | Any and all Responses to Requests for Admissions by Mark Schnee | | | |
| D-45 | Any and all Stipulations of Counsel | | | |
| D-46 | Curriculum Vitae/Resume of Mark Schnee | | | |
| D-47 | Certified copy of criminal record relative to Candace Ray | | | |
| D-48 | Articles of clothing worn by Candace Ray on 07/02/00 (as preserved by Plaintiff in discovery) | | | |
| D-49 | AMH Administrative Policy and Procedure 12.1 regarding Release of Information | | | |
| D-50 | AMH Administrative Policy and Procedure 12.2 regarding Release of Information-Procedure for Responding to Telephone Requests for Release of Information | | | |
| D-51 | AMH Administrative Policy and Procedure 12.11 regarding Release of Information from Psychiatric/Mental Health Care Records | | | |

| No. | Exhibit | Identified | | Admitted |
|------|--|------------|----|----------|
| | | Date | By | |
| D-52 | AMH Administrative Policy and Procedure regarding Accuracy of Medical Record Documentation | | | |
| D-53 | AMH Administrative Policy and Procedure regarding Assembly of Medical Records Upon Discharge | | | |
| D-54 | AMH ETC Policy and Procedure regarding Medical Records | | | |
| D-55 | AMH Rules and Regulations of the Medical Staff | | | |
| D-56 | AMH Medical Staff-Rules and Regulations of the Medical Record Committee (various sections) regarding "Patient Access to Medical Records," "Record Review" and "Security/Confidentiality" | | | |
| D-57 | AMH Memo dated 07/21/98 regarding Montgomery County Emergency Service Guidelines for 302 Conversions | | | |
| D-58 | AMH Crisis Intervention Clinician Job Description | | | |
| D-59 | Personnel file of Mark Schnee as redacted and produced in discovery | | | |
| D-60 | APD Incident Report No. 00-041048 dated 07/02/00 | | | |
| D-61 | APD Offense Report by Officer Nisbet dated 07/02/00 | | | |
| D-62 | APD Utility Report by Officer King dated 07/02/00 | | | |
| D-63 | APD Arrest Report dated 07/02/00 | | | |

| No. | Exhibit | Identified | | Admitted |
|------|--|------------|----|----------|
| | | Date | By | |
| D-64 | APD Offense Report dated 07/02/00 | | | |
| D-65 | APD Use of Force Report dated 07/02/00 | | | |
| D-66 | APD Property Receipt dated 07/02/00 | | | |
| D-67 | Commonwealth of Pennsylvania Criminal Complaint filed 07/05/00 | | | |
| D-68 | Commonwealth of Pennsylvania Affidavit of Probable Cause dated 07/06/00 | | | |
| D-69 | Application for Involuntary Emergency Examination and Treatment (Section 302) by Officer Nisbet dated 07/02/00 | | | |
| D-70 | Montgomery County Criminal Justice System Docket relative to Candace Ray | | | |
| D-71 | APD Incident Report No. 00-042072 dated 07/07/00 | | | |
| D-72 | APD Incident Report No. 00-042151 dated 07/07/00 | | | |
| D-73 | APD Incident Report No. 00-041017 dated 07/07/00 | | | |
| D-74 | APD Incident Report No. 00-041075 dated 07/02/00 | | | |
| D-75 | Various letters written by Candace Ray, as produced in discovery | | | |
| D-76 | Photographs of the Emergency Room at AMH | | | |

| No. | Exhibit | Identified | | Admitted |
|------|--------------------------|------------|----|----------|
| | | Date | By | |
| | | | | |
| D-77 | Medical Texts | | | |
| D-78 | Medical Journal Articles | | | |
| D-79 | Anatomical Models | | | |
| D-80 | Illustrations | | | |
| D-81 | Chart/Timelines | | | |
| D-82 | Models | | | |
| D-83 | | | | |
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| No. | Exhibit | Identified | | Admitted |
|------|---------|------------|----|----------|
| | | Date | By | |
| D-92 | | | | |

Defendants, Abington Memorial Hospital and Mark Schnee, reserve the right to use and offer into evidence any exhibit identified by any other party to this action.

Defendants, Abington Memorial Hospital and Mark Schnee, reserve the right to petition the Trial Judge to supplement the itthin Exhibit List should the interests of justice permit.

Respectfully Submitted,

WHITE AND WILLIAMS LLP

BY: 

David R. Zaslow, Esquire
Attorney for Defendants,
Abington Memorial Hospital and
Mark Schnee

Dated: _____